

**IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI**

MICHAEL DAILEY, et al.,

Plaintiffs,

v.

BRIDGETON LANDFILL, LLC, et al.,

Defendants.

Case No. 4:22-cv-00116-CDP

BRIDGETON LANDFILL, LLC, et al.,

Third-Party Plaintiff,

v.

UNITED STATES FIDELITY AND
GUARANTY COMPANY, et al.,

Third-Party Defendants.

**CONSENT MOTION
FOR EXTENSION OF TIME FOR BRIDGETON LANDFILL, LLC, REPUBLIC
SERVICES, INC., AND ALLIED SERVICES, LLC (“LANDFILL DEFENDANTS”)
TO RESPOND TO PLAINTIFFS’ MOTION TO REMAND**

Defendants Bridgeton Landfill, LLC, Republic Services, Inc., and Allied Services, LLC (“Landfill Defendants”) request an agreed extension to respond to Plaintiffs’ Motion to Remand from March 14, 2022 to April 4, 2022. In support of this consent motion, Landfill Defendants state that:

1. On February 28, 2022, Plaintiffs filed their Motion to Remand and Memorandum in Support.
2. Landfill Defendants’ response is due March 14, 2022, and Landfill Defendants

request a brief extension to adequately respond.

3. Landfill Defendants have conferred with Celeste Brustowicz, counsel for Plaintiffs, and Brian Watson, counsel for Cotter, and they consent to this Motion for Extension of Time.

4. The agreed extension is requested in good faith and not for purposes of delay or other improper purpose.

WHEREFORE, Landfill Defendants respectfully request that this Court grant their extension to file their Response to Plaintiffs' Motion to Remand, up to and including April 4, 2022.

Dated: March 7, 2022

By: /s/ Allyson E. Cunningham
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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the foregoing was served on all counsel of record via the court's electronic filing system on March 7, 2022.

/s/ Allyson E. Cunningham